

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Suzanne E. Leberman

Chapter 7

Debtor.

Case No. 10-32520-PP

**MOTION TO RECOVER ATTORNEY'S FEES IN CONNECTION WITH DEUTSCHE
BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR ABFC 2005-AQ1 TRUST,
ASSET-BACKED CERTIFICATES, SERIES 2005-AQ1'S MOTION FOR RELIEF
FROM AUTOMATIC STAY AND ABANDONMENT RE; PROPERTY LOCATED AT:
S73 W17015 BRIARGATE LANE, MUSKEGO, WI**

The above-referenced Debtor, by the Law Offices of Rollie R. Hanson, S.C., brings this motion in conjunction with and in addition to the Debtor's Objection to the Motion for Relief from Stay on file in this case. In support of this Motion, the Debtor respectfully shows to the court as follows:

- (1) The Debtor reasserts her position as stated in the Objection to Relief from Stay on file in this case.
- (2) The Debtor asserts that there was no cause nor basis for the Movant to bring a relief from Stay Motion. The Movant brought a frivolous Relief from Stay Motion and upon the Debtor providing proof of all payments to the Movant, the Movant has refused to withdraw said motion.
- (3) The Debtor has incurred attorney's fees in defending the Relief from Stay Motion that would not have been incurred but for the Movant's frivolous Relief from Stay Motion.

WHEREFORE, the Debtor, in addition to this Court sustaining the Debtor's Objection to the Movant's Relief from Stay motion, respectfully requests that this Court enter an Order for the Movant to pay the Debtor's attorney's fees related to this matter and any other relief the Court deems just.

Dated at West Allis, Wisconsin this 12th day of November, 2010.

Law Office of Rollie R. Hanson, S.C.
6737 W. Washington Street, Suite 1420
West Allis, WI 53214
Telephone: (414)321-9733/Fax: (414)321-9601
Rollie@hansonlaw.net

/s/ *Rollie R. Hanson*

Rollie R. Hanson,
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Suzanne E. Leberman

Chapter 7

Debtor.

Case No. 10-32520-PP

**NOTICE OF MOTION TO RECOVER ATTORNEY'S FEES IN CONNECTION WITH
DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR ABFC 2005-
AQ1 TRUST, ASSET-BACKED CERTIFICATES, SERIES 2005-AQ1'S MOTION FOR
RELIEF FROM AUTOMATIC STAY AND ABANDONMENT RE; PROPERTY
LOCATED AT: S73 W17015 BRIARGATE LANE, MUSKEGO, WI**

PLEASE TAKE NOTICE that the Debtor has filed a motion with the Court requesting that the Court enter an Order awarding Attorney's Fees to the Debtor in connection with Deutsche Bank National Trust Company, as Trustee for ABFC 2005-AQ1 Trust, Asset-Backed Certificates, Series 2005-AQ1's Motion for Relief from the Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.

If you do not want the Court to enter an order granting the relief sought in the Motion to Recover Attorney's Fees, or if you want the Court to consider your views on the Motion to Recover Attorney's Fees, then on or before **November 26, 2010** you or your attorney must:

File with the court a written objection to the Motion and request for a hearing with:

U.S. Bankruptcy Clerk
U.S. Courthouse, Room 126
517 East Wisconsin Avenue
Milwaukee, WI 53202

THE LAW OFFICE OF ROLLIE R. HANSON, S.C.
6737 W. Washington Street, Suite 1420
West Allis, WI 53214
(414) 321-9733 Fax (414) 321-9601
Rollie@hansonlaw.net

If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above. Further, any written objection must state specific grounds or reasons for the objection.

You must also mail a copy to:

The Law Office of Rollie R. Hanson S.C.
6737 W. Washington Street, Suite 1420
West Allis, WI 53214

If you or your attorney do not take these steps, the court may decide that you do not oppose the Motion sought and may enter an order granting that relief.

Dated this 12th day of November, 2010 at West Allis, WI.

/s/ Rollie R. Hanson

Rollie R. Hanson
Attorney for Debtor.

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EASTERN DISTRICT OF WISCONSIN

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AFFIDAVIT OF SERVICE

STATE OF WISCONSIN)
 (SS
COUNTY OF MILWAUKEE)

Jared Nusbaum, being first duly sworn on oath, deposes and says that on November 12, 2010 he served via CM/ECF at West Allis, Wisconsin, a true and correct copy of the *Motion to Recover Attorney's Fees in Connection with Deutsche Bank National Trust Company, as Trustee for ABFC 2005-AQ1 Trust, Asset-Backed Certificates, Series 2005-AQ1's Motion for Relief from the Automatic Stay* to the parties of interest listed below:

Steven R. McDonald
Chapter 7 Trustee

Via CM/ECF

Office of the U.S. Trustee

ustpreion11.mi.ecf@usdoj.gov

Deutsche Bank National Trust Company
c/o M. Abigail O'Dess
O'Dess and Associates, S.C.
1414 Underwood Avenue, Suite 403
Wauwatosa, WI 53213

Via CM/ECF

/s/ Jared Nusbaum

Jared Nusbaum

Subscribed and sworn to before
me this 12th day of November, 2010.

/s/ Rollie R. Hanson

Rollie R. Hanson
Notary Public, State of Wisconsin
My Commission is permanent

LAW OFFICE OF ROLLIE R. HANSON, S.C.
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